

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**FELICIA HOLLINS,**

**Plaintiff,**

**v.**

**EXPERIAN INFORMATION SOLUTIONS,  
INC.,**

**Defendant.**

**Case No.: 1:24-cv-07664**

**NOTICE OF CROSS-MOTION TO  
AMEND**

**Honorable Andrea R. Wood**

**PLEASE TAKE NOTICE** that the undersigned attorneys for Plaintiff Felicia Hollins hereby cross-moves before the Honorable Andrea R. Wood, U.S.D.J., for an Order pursuant to FRCP 15 granting the Plaintiff leave to file a Second Amended Complaint and for such other relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that Plaintiff shall rely upon the accompanying Declaration and Exhibits in Support of his Motion.

**PLEASE TAKE FURTHER NOTICE** that on November 13, 2024, counsel for the Plaintiff conferred with counsel for the Defendant to obtain their consent to the relief requested herein. Counsel for Defendant has nevertheless advised that they are opposed to the relief requested herein.

Dated: November 14, 2024

By: /s/ Yitzchak Zelman  
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